

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WOLVERINE PROCTOR & SCHWARTZ)
INC., and GREAT AMERICAN)
ALLIANCE INSURANCE CO., INC.)
Plaintiffs)

v.)

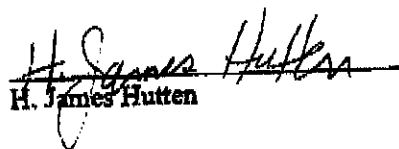
XYZ TAPE CORP., f/k/a PATCO CORP.,)
WILLIAM B. WILBUR, and)
TRAVELERS PROPERTY CASUALTY)
COMPANY OF AMERICA,)
Defendants.)

Civil Action No. 04-12189RWZ

**CERTIFICATION BY DEFENDANT TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA PURSUANT TO LOCAL RULE 16.1(D)(3)**

Pursuant to Local Rule (D. Mass). 16.1(D)(3), the defendant Travelers Property Casualty Company of America hereby certify that it and its counsel have conferred: (a) with a view toward establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and (b) to consider resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA
By:


H. James Hutten

Respectfully submitted,
Travelers Property Casualty Company of
America



Joseph S. Berman, Esq.

BBO No. 566006

Berman & Dowell

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CERTIFICATE OF SERVICE

I, Joseph S. Berman, hereby certify that on this 25th day of January, 2005, I filed a copy of the foregoing by electronic means with the United States District Court for the District of Massachusetts using the CM/ECF system, which will send notification to the following: Matthew J. Walko, Esq., Smith & Duggan LLP, Two Center Plaza, Suite 620, Boston, MA 02108; and Lee MacPhee, Esq., Morrison Mahoney LLP, 250 Summer Street, Boston, MA 02210 and that the document has been served on all counsel of record in compliance with the Federal Rules of Civil Procedure.



/s/ Joseph S. Berman

Joseph S. Berman